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October 14, 2022

Via ECF

The Honorable John G. Koeltl, U.S. District Judge
U.S. District Court, Southern District of New York
500 Pearl St.
New York, NY 10007

APPLICATION GRANTED
SO ORDERED

A handwritten signature of John G. Koeltl in black ink, written over a horizontal line.

John G. Koeltl, U.S.D.J.

10/17/22

**Re: *NSI International, Inc. v. Horizon Group USA, Inc.*,
Docket No. 1:20-cv-08389 (S.D.N.Y. Oct. 07, 2020)**

Dear Judge Koeltl:

We represent Plaintiff NSI International, Inc. ("NSI") in the above-referenced matter against Defendant Horizon Group USA, Inc. ("Horizon"). We are writing to request an extension of the fact discovery deadline, currently set for November 10, 2022, and extension of corresponding deadlines below. (Scheduling Order, ECF No. 64.). Prior to submitting this request for an extension, our office conferred with Defendant's counsel, Armin Ghiam, Esq., and he consented to the extension request.

The Parties are engaging in discovery in the normal course, and have agreed to complete their document productions by October 19, 2022. This date is based on the parties' several meet and confers about additional documents that need to be produced. A discovery dispute is also pending before the Magistrate Judge in which NSI has asked for an order compelling production of documents from Horizon which it presently refuses to produce. Depositions remain outstanding for both Parties, and it is not yet clear how many depositions will be needed or who the deponents should be.

The Parties anticipate needing time to review the forthcoming documents and time to schedule depositions thereafter. The Parties also have pre-existing cross-country travel for major hearings in other cases in late October and November. For these reasons, the Parties anticipate that the majority of the depositions will be taken in December and January, however, we also need to account for the holidays at this time of year. In light of the foregoing, we respectfully request that the November 10, 2022 fact discovery deadline be extended to January 31, 2023, and that the corresponding deadlines be extended by the same length of time.

Magistrate Judge Cott
October 14, 2022

EVENT	CURRENT DATE	PROPOSED DATE
Fact Discovery Cutoff	November 10, 2022	January 31, 2023
Initial Designation of Experts and Expert Reports	December 29, 2022	March 21, 2023
Rebuttal Expert Report Deadline	January 26, 2023	April 18, 2023
Expert Discovery Cutoff	March 28, 2023	June 19, 2023
Dispositive Motion Filing Deadline	April 18, 2023	July 9, 2023
Joint Pretrial Order Due	May 18, 2023	August 8, 2023
Pretrial Conference		
Pre-Trial Filings Due	May 18, 2023 or 21 days after decision of any dispositive motion	August 8, 2023 or 21 days after decision of any dispositive motion
Trial Date	At the Court's earliest convenience; Ready – Trial 48 hours' notice, 21 days after the filing of the Joint Pre-Trial Order.	At the Court's earliest convenience; Ready – Trial 48 hours' notice, 21 days after the filing of the Joint Pre-Trial Order.

The initial scheduling order deadlines, (ECF No. 49), were reset following the Court's decision on NSI's Motion to Dismiss, (Mot. to Dismiss Order, ECF No. 57; Scheduling Order, ECF No. 64.), but this is the first request for an extension of the dates set in the current Scheduling Order.

Respectfully yours,



Michael J. Zinna

cc: All Counsel of Record